

Comments and Responses on ARC 6929B  
Addition of Medicaid Coverage of Behavioral Health Services  
Received August 6, 2008

The following persons and organizations provided written comments, which are included in the summary below:

Kelli Soyer, executive director, National Association of Social Workers Iowa Chapter

COMMENT: ...there appears to be one discrepancy between the administrative rules and the intent of Senate File 2425. The original passed legislation includes the “LMSW who holds a Masters degree approved and is licensed by the Board of Social Work Examiners.” The draft rules read “any person licensed by the board of social work pursuant to 645 – Chapter 280 as a master social worker...” One could interpret the administrative rules to include all social workers licensed at the LMSW level. The difference between the draft rules and the law affects LMSWs grandfathered into licensure in the late 1990’s. There were a handful of individuals grandfathered at the LMSW level who do not hold a Masters degree. The intent of the law is to exclude LMSWs who hold only a bachelors degree. I would encourage the rules to reflect the intent of the law. (Soyer)

RESPONSE: The Department agrees to modify subrule 77.26(3) to read as follows:

**77.26(3)** Licensed master social workers (LMSW).

- a. A person licensed by the board of social work as a master social worker pursuant to 645--Chapter 280 is eligible to participate when the person:
  - (1) Holds a masters or doctoral degree in social work from a college or university that was accredited by the Council on Social Work Education at the time of the person’s graduation; and
  - (2) Provides treatment under the supervision of an independent social worker licensed pursuant to 645--Chapter 280.
- b. A master social worker in another state is eligible to participate when the person:
  - (1) Is duly licensed to practice in that state; and
  - (2) Provides treatment under the supervision of an independent social worker duly licensed in that state.